

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: BRUCE E BATES, SR. : CHAPTER 13
:
: BANKRUPTCY 24-10737 AMC
DEBTOR :

**DEBTOR'S OBJECTION TO THE
CERTIFICATION OF DEFAULT BY CROSSCOUNTRY MORTGAGE, LLC.**

TO THE HONORABLE ASHELY M CHAN, CHIEF BANKRUPTCY JUDGE:

Movant/Debtor, **Bruce E. Bates, Sr.**, by and through his attorney, **MICHAEL SCHWARTZ, ESQUIRE**, hereby files this Objection to the Certification of Default filed by CrossCountry Mortgage, LLC, Respondent/Creditor, and in support thereof, avers as follows:

1. On February 11, 2025, Movant/Creditor CrossCountry Mortgage, LLC, filed a Certification of Default with this Court alleging that Debtor was in post-petition arrears on his mortgage.

2. The sole reason that Movant/Creditor filed the Certification of Default is because of the alleged arrears in the mortgage payments.

3. On February 11, 2025, Debtor made payments to CrossCountry Mortgage LLC to cure the postpetition delinquency - confirmation #: 1751504777 for the amount \$9,811.05.

WHEREFORE, Debtor respectfully requests that this Court deny Creditor's request to sign the Order submitted to the Court and declare that the automatic stay is still in effect.

Respectfully submitted,

\s\ Michael Schwartz
MICHAEL SCHWARTZ, ESQUIRE
Attorney for Debtor